

Craig A. Newby (Nevada Bar No. 8591)
McDONALD CARANO, LLP
2300 W. Sahara Ave., Ste. 1200
Las Vegas, NV 89102
Tel. (702) 873-4100
Fax (702) 873-9966
Email: cnewby@mcdonaldcarano.com

John B. Sganga, Jr. (Admitted *Pro Hac Vice*)
Sean M. Murray (Admitted *Pro Hac Vice*)
Joshua Stowell (Admitted *Pro Hac Vice*)
Justin J. Gillett (Admitted *Pro Hac Vice*)
KNOBBE, MARTENS, OLSON & BEAR, LLP
2040 Main Street, Fourteenth Floor
Irvine, CA 92614
Phone: (949) 760-0404
Facsimile: (949) 760-9502
Email: john.sganga@knobbe.com
Email: sean.murray@knobbe.com
Email: joshua.stowell@knobbe.com
Email: justin.gillett@knobbe.com

*Attorneys for Plaintiff,
JS Products, Inc.*

FOLEY & OAKES, PC
Daniel T. Foley (Nevada State Bar No.
1079)
626 So. 8th Street
Las Vegas, NV 89101
Telephone: (702) 384-2070
Facsimile: (702) 384-2128
Email: Dan@foleyoakes.com

BUETHER JOE & CARPENTER, LLC
ERIC W. BUETHER (*to be Admitted Pro
Hac Vice*)
Email: Eric.Buether@BJCIPLaw.com
CHRISTOPHER M. JOE (*to be Admitted
Pro Hac Vice*)
Email: Chris.Joe@BJCIPLaw.com
MICHAEL D. RICKETTS (*to be Admitted
Pro Hac Vice*)
Email: Mickey.Ricketts@BJCIPLaw.com
1700 Pacific Avenue, Suite 4750
Dallas, Texas 75201
Telephone: (214) 466-1270
Facsimile: (214) 635-1842

*Attorneys for Defendant,
ROLLER CLUTCH TOOLS, LLC*

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA**

JS PRODUCTS, INC., a Nevada corporation,

Plaintiffs,

v.

ROLLER CLUTCH TOOLS, LLC,
a California limited liability company,

Defendant.

Case No. 2:17-cv-02615-GMN-GWF

**STIPULATION REGARDING
EXTENSION OF TIME FOR PLAINTIFF
TO RESPOND TO DEFENDANT'S
MOTION TO DISMISS; AND TO REPLY
TO ITS MOTION TO ENJOIN ROLLER
CLUTCH FROM PROSECUTING CASE
AGAINST DEFENDANT BEFORE THE
EASTERN DISTRICT TO TEXAS**

**(Third Request for Extension to Respond to
Motion to Dismiss)**

**(Fourth Request for Extension to Reply to
Its Motion to Enjoin Roller Clutch)**

1 Pursuant to Fed. R. Civ. P. 6(b)(1)(A), Local Rules 6-1 and 6-2, Plaintiff JS Products,
2 Inc. ("JS Products" or "Plaintiff") has requested, and Defendant Roller Clutch Tools, LLC
3 ("Roller Clutch" or "Defendant") has agreed to, a two week extension of time, until **February**
4 **2, 2018**, for Plaintiff to file its Response to Defendant's Motion to Dismiss for Lack of Personal
5 Jurisdiction Under Fed. R. Civ. P. 12(b)(2) and Improper Venue Under Fed. R. Civ. P. 12(b)(3).
6 (ECF No. 30, "Motion"). This is the Parties' third request for an extension of the deadline to
7 oppose the Motion. The Motion was originally filed on December 15, 2017 and the opposition
8 is currently scheduled to be due on or before January 19, 2018.

9 Further, Defendant has also agreed to, a two week extension of time, until **February 2,**
10 **2018**, for Plaintiff to file its Reply to Its Motion to Enjoin Roller Clutch Tools, LLC from
11 Prosecuting its Case Against Defendant before the United States District Court for the Eastern
12 District of Texas. (ECF No. 07, "Motion"). This is the Parties' fourth request for an extension
13 of the deadline to oppose the Motion. The Motion was originally filed on October 20, 2017, the
14 Opposition (ECF No. 29, "Opposition") was filed December 15, 2017 and the Reply is
15 currently scheduled to be due on or before January 19, 2018.

16 **Good cause exists for this Court to grant this final extension because the Parties**
17 **have reached an agreement in principle that settles all matters in controversy between**
18 **them.** Since submitting the last request for a time extension, the parties have exchanged
19 several drafts of a comprehensive settlement agreement and are making progress toward
20 reaching mutually agreeable language for several provisions in the agreement. The Parties
21 respectfully and jointly request that this Court grant the requested extension to allow the parties
22 to devote their full attention to finalizing the agreement, which will result in a dismissal
23 stipulation being filed with the Court, and will moot the pending motions. **The parties are**
24 **amenable to a status conference before the Court, should it desire a further update on the**
25 **status of drafting a final, comprehensive settlement agreement.**

26 Accordingly, the Parties hereby stipulate that Plaintiff has until **February 2, 2018** to
27 file its Opposition to Defendant Roller Clutch's Motion to Dismiss for Lack of Personal
28 Jurisdiction Under Fed. R. Civ. P. 12(b)(2) and Improper Venue Under Fed. R. Civ. P.

1 12(b)(3); and to Reply to Its Motion to Enjoin Roller Clutch Tools, LLC from Prosecuting its
2 Case Against the Defendant in the matter before the United States District Court for the
3 Eastern District of Texas.

4 Dated: January 17, 2018

MCDONALD CARANO LLP

/s/ Craig A. Newby

Craig A. Newby (Nevada Bar No. 8591)
Amanda M. Perach (Nevada Bar No. 12399)
2300 W. Sahara Ave., Suite 1200
Las Vegas, NV 89102
Telephone: (702) 873-4100
Facsimile: (702) 873-9966
Email: cnewby@mcdonalddcarano.com

John B. Sganga, Jr. (Admitted *Pro Hac Vice*)
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Phone: (949) 760-0404
Facsimile: (949) 760-9502
Email: john.sganga@knobbe.com
Email: sean.murray@knobbe.com
Email: joshua.stowell@knobbe.com
Email: justin.gillett@knobbe.com

Attorneys for Plaintiff, JS Products, Inc.

1 Dated: January 17, 2018

BUETHER JOE & CARPENTER, LLC

3 /s/ Michael D. Ricketts

Daniel T. Foley (Nevada State Bar No.1078)

626 So. 8th Street

Las Vegas, NV 89101

FOLEY & OAKES, PC

Telephone: (702) 384-2070

Facsimile: (702) 384-2128

Email: Dan@foleyoakes.com

Eric W. Buether (*to be Admitted Pro Hac Vice*)

Email: Eric.Buether@BJCIPLaw.com

Christopher M. Joe (*to be Admitted Pro Hac Vice*)

Email: Chris.Joe@BJCIPLaw.com

Michael D. Ricketts (*to be Admitted Pro Hac Vice*)

Email: Mickey.Ricketts@BJCIPLaw.com

1700 Pacific Avenue, Suite 4750

Dallas, TX 75201

Telephone: (214) 466-1270

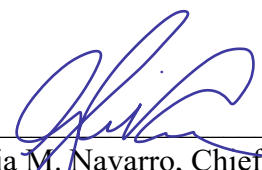
Facsimile: (214) 635-1842

Attorneys for Defendant, Roller Clutch Tools, LLC

ORDER

IT IS SO ORDERED.

DATED this 18 day of January, 2018.


Gloria M. Navarro, Chief Judge

UNITED STATES DISTRICT JUDGE

1 **CERTIFICATE OF SERVICE**

2 I HEREBY CERTIFY that I am an employee of McDonald Carano LLP, and that on
3 January 17, 2018, I caused a true and correct copy of the foregoing **STIPULATION**
4 **REGARDING EXTENSION OF TIME FOR PLAINTIFF TO RESPOND TO**
5 **DEFENDANT’S MOTION TO DISMISS; AND TO REPLY TO ITS MOTION TO**
6 **ENJOIN ROLLER CLUTCH FROM PROSECUTING CASE AGAINST DEFENDANT**
7 **BEFORE THE EASTERN DISTRICT TO TEXAS**, to be served via the U.S. District Court’s
8 Notice of Electronic Filing (“NEF”) in the above-captioned case to:

9
10 Daniel T. Foley (Nevada State Bar No.1078)
11 626 So. 8th Street
12 Las Vegas, NV 89101
13 Telephone: (702) 384-2070
14 Facsimile: (702) 384-2128
15 Email: Dan@foleyoakes.com

16 Eric W. Buether (*to be admitted pro hac vice*)
17 Email: Eric.Buether@BJCIPLaw.com
18 Christopher M. Joe (*to be admitted pro hac vice*)
19 Email: Chris.Joe@BJCIPLaw.com
20 Michael D. Ricketts (*to be admitted pro hac vice*)
21 Email: Mickey.Ricketts@BJCIPLaw.com
22 **BUETHER JOE & CARPENTER, LLC**
23 1700 Pacific Avenue, Suite 4750
24 Dallas, TX 75201
25 Telephone: (214) 466-1270
26 Facsimile: (214) 635-1842

27 *Attorneys for Defendant,*
28 *Roller Clutch Tools, LLC*

29 */s/ Brian Grubb*
30 _____
31 An Employee of McDonald Carano LLP